

EXHIBIT F REDACTED

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

- - -

WAYMO, LLC,)
)
Plaintiff,)
)
vs.) No. 3:17-CV-00939
)
UBER TECHNOLOGIES; INC.;)
OTTOMOTTO, LLC; and OTTO)
TRUCKING, LLC,)
)
Defendants.)

ATTORNEYS' EYES ONLY - HIGHLY CONFIDENTIAL

The videotaped 30(b)(6) deposition of ERIC MEYHOFER, called as a witness by the Plaintiff, pursuant to notice and the Federal Rules of Civil Procedure pertaining to the taking of depositions, taken before me, the undersigned, Rebecca L. Schnur, Notary Public in and for the Commonwealth of Pennsylvania, at the offices of Reed Smith, LLP, 225 Fifth Avenue, Pittsburgh, Pennsylvania 15222, commencing at 9:20 a.m. on FRIDAY, AUGUST 18, 2017.

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1 Mr. Levandowski provide to Uber in the entries 12:57:44
2 reflected in this log before January 25, 2016? 12:57:47
3 A. What technical contributions did Anthony give 12:57:55
4 to Uber before -- 12:57:58
5 Q. Technical information. 12:58:01
6 Let me be more specific. What technical 12:58:04
7 information regarding lidar did Mr. Levandowski provide 12:58:06
8 to Uber before January 25, 2016? 12:58:09
9 MR. HUME: Objection to the form. 12:58:16
10 A. So I don't see him talking to [REDACTED] at this 12:58:23
11 time, before then. So at this point it's [REDACTED] So he 12:58:27
12 would have been receiving information from Uber about 12:58:40
13 specifications and agreeing or disagreeing as to 12:58:47
14 whether or not he thought he could meet them. 12:58:52
15 Q. Okay. So before January 25, 2016, which are 12:58:58
16 the first [REDACTED] -- let's make it January 27, 2016, which 12:59:13
17 are the first [REDACTED] ntries on this lidar log, Anthony 12:59:20
18 Levandowski provided no technical information regarding 12:59:26
19 lidar. Is that right? 12:59:30
20 A. I think he would -- I don't -- I don't know 12:59:38
21 exactly what he said with all of these people, but 12:59:41
22 these aren't people he would have been designing 12:59:44
23 anything with. So I would assume that he was providing 12:59:46
24 no technical information about the design of lidar. He 12:59:48
25 would have been remarking on whether or not he could 12:59:52

1 build lidar that [REDACTED] would have been describing to 12:59:54
2 him. 12:59:57

3 Q. I want to break that down, but before I do, 12:59:58
4 when we have those words again, where it's "assume" and 13:00:01
5 "probably" -- 13:00:05

6 So I want to ask my question again. Before 13:00:07
7 January 27, 2016, which are the first [REDACTED] entries on 13:00:12
8 this lidar log, did Anthony Levandowski provide 13:00:16
9 technical information regarding lidar to Uber? 13:00:20

10 A. Not that I know of. 13:00:24

11 Q. Do you know? Did you check, in preparation 13:00:25
12 for your deposition testimony today? 13:00:27

13 A. I talked with [REDACTED] and 13:00:32
14 didn't specifically ask them whether or not any 13:00:40
15 technical information was provided to them before 13:00:42
16 January 25 or 27. But they didn't produce any 13:00:46
17 information that says anything to the contrary. And 13:00:56
18 [REDACTED] was leading our design effort for all things 13:01:01
19 lidar at that time. 13:01:07

20 Q. Let me ask my question again because I'm not 13:01:09
21 sure of the answer. 13:01:13

22 Before January 27, 2016, on behalf of Uber 13:01:16
23 and Ottomotto, did Anthony Levandowski provide 13:01:20
24 technical information regarding lidar to Uber or Otto? 13:01:23

25 A. Not that I know of. 13:01:28

1 Q. Did you prepare to answer that question on 13:01:30
2 behalf of the company for your testimony today? 13:01:32
3 A. No, I did not. 13:01:35
4 Q. So you're not prepared to answer that 13:01:36
5 question one way or the other. Is that fair? 13:01:37
6 A. Aside from the fact that I worked very 13:01:40
7 closely with [REDACTED] and that is not 13:01:42
8 information that I was ever exposed to. 13:01:45
9 Q. But you didn't review any of the 13:01:47
10 communications that are reflected on this log. Right? 13:01:49
11 A. No, I did not. 13:01:51
12 Q. You didn't ask any of the individuals that 13:01:52
13 are reflected on this log whether any information was 13:01:54
14 provided, did you? 13:01:57
15 A. No, I did not. 13:01:58
16 Q. Isn't it fair to say that you have no idea 13:01:58
17 whether he disclosed information or not? 13:02:01
18 MR. HUME: Objection to the form. 13:02:03
19 Mischaracterizes testimony. 13:02:04
20 A. I don't think it's fair to say I have no 13:02:06
21 idea. 13:02:07
22 I think it's fair to say that the questions 13:02:08
23 you asked me I don't have the answer -- the answer is, 13:02:09
24 no. 13:02:12
25 Q. Because you don't know, you didn't check? 13:02:13

1 A. Well, I didn't specifically ask those people 13:02:15
2 those questions. But I worked closely with [REDACTED] [REDACTED]
[REDACTED] and likely would have known if there was some sort 13:02:21
4 of technical information exchange. 13:02:24
5 Q. Okay. I guess we'll do this another way 13:02:27
6 then. Let's go to entry 22. 13:02:30
7 A. Okay. 13:02:44
8 Q. This is a meeting between Mr [REDACTED] [REDACTED]
[REDACTED] regarding lidar. 13:02:48
10 Do you see that? 13:02:53
11 A. Regarding lidar supplier deal, yes. 13:02:54
12 Q. And Mr. Levandowski was at that meeting. 13:02:56
13 Right? 13:02:58
14 A. Uh-huh. 13:02:58
15 Q. What did Mr. Levandowski contribute at that 13:02:59
16 meeting, if anything? 13:03:02
17 A. I would assume nothing but say yes or no as 13:03:05
18 to whether or not he thought he could supply lidar to 13:03:07
19 these, to -- 13:03:09
20 Q. I don't want you to assume, sir. 13:03:10
21 A. I don't have -- I wasn't there. 13:03:12
22 Q. Right. So let me ask my question: What did 13:03:13
23 Mr. Levandowski contribute to this lidar meeting 13:03:17
24 reflected here as number 22? 13:03:19
25 A. I don't know. 13:03:22

1 Q. Let's go to number 23. What did 13:03:23
2 Mr. Levandowski contribute to meeting number 23, on 13:03:26
3 [REDACTED] 13:03:29
4 A. I can read that it says, [REDACTED] [REDACTED]
[REDACTED] " So that's 13:03:35
6 what I would assume was the contribution. 13:03:38
7 Q. So other than reading what's in this 13:03:40
8 document, can you provide me any information, sitting 13:03:42
9 here today, on behalf of Uber and Otto, what 13:03:45
10 Mr. Levandowski said or did or contributed at this 13:03:48
11 meeting? 13:03:50
12 A. No. 13:03:51
13 Q. And you didn't prepare to do that for your 13:03:52
14 testimony today. Right? 13:03:54
15 A. That is correct. 13:03:56
16 Q. All right. So I can go through each one of 13:03:56
17 these entries, but is it fair to say for these first [REDACTED] 13:03:59
18 entries, you don't know what Anthony Levandowski said; 13:04:02
19 you don't know what he contributed? 13:04:07
20 A. Within reason, that is fair to say. 13:04:11
21 Q. All right. Mr. Levandowski [sic], you're 13:04:16
22 designated to testify on behalf of topic number 1. 13:04:23
23 Right? 13:04:25
24 MR. HUME: Objection. You misspoke his name. 13:04:26
25 A. I'm not Anthony. 13:04:30

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1 Q. I was going to read the topics. Sorry. I 13:04:31
2 realize now -- that makes sense. 13:04:33
3 You are designated to testify regarding topic 13:04:36
4 number 1 regarding Mr. Levandowski's development of 13:04:38
5 lidar? 13:04:40
6 A. Yes. 13:04:41
7 Q. What did you do to -- 13:04:43
8 MR. HUME: I think -- just for the record, I 13:04:44
9 think he's designated only for Uber, I think. 13:04:44
10 Q. What are -- 13:04:50
11 MR. JAFFE: He's only designated -- I'm 13:04:50
12 sorry. What did you say? 13:04:52
13 MR. HUME: I think he's designated for 13:04:52
14 Levandowski's involvement in the development at 13:04:55
15 lidar at Uber, on behalf of Uber. I don't know 13:05:01
16 that he can speak to what happened at Ottomotto. 13:05:03
17 MR. JAFFE: So the designation did not say 13:05:08
18 that. 13:05:11
19 MR. HUME: I'll check on a break. Why don't 13:05:12
20 you ask him questions. We'll see if we have an 13:05:13
21 Ottomotto designee separately. Maybe not. 13:05:17
22 Q. Okay. Mr. Levandowski [sic], what did you 13:05:19
23 do to prepare -- not -- you are not Mr. Levandowski. 13:05:23
24 What did you do to prepare to testify about 13:05:25
25 Mr. Levandowski's development or contributions to 13:05:28